



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278*

February 1, 2024

BY ECF

The Honorable Laura Taylor Swain
Chief United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Aimee Harris*, 22 Cr. 457 (LTS)

Dear Chief Judge Swain:

The Government respectfully submits this letter to request that the Court direct defendant Aimee Harris to produce to the Court and the Government a complete copy of the medical record that was submitted in part to the Court and the Government yesterday, January 31, 2024.

On January 30, 2024, this Court entered an order directing the defendant, among other things, to provide defense counsel with “documentation of her diagnosis and treatment at the hospital emergency room on January 30, 2024,” “no later than 5:00 p.m. on Wednesday January 31, 2024,” and that defense counsel then “must immediately provide such information to the Government and the Court” (Dkt. 74).

On January 31, 2024, at 4:58 p.m., defense counsel provided to the Court and the Government pages 1, 4, and 7 of what appears to be, based on the medical record’s pagination, a 19-page document. Thereafter, the Government promptly wrote to defense counsel and requested the complete medical record. Defense counsel responded, in substance and in part, that they had requested that the defendant provide them with the full medical record, and that they had provided to the Court and the Government all of the portions of the record that they had received from the defendant.

In order to permit the Court and the Government to sufficiently assess what occurred on January 30, 2024, the Government requests that the defendant be directed to promptly provide defense counsel with the complete 19-page medical record, and that defense counsel then be required to immediately provide that record to the Court and the Government.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/
Jacqueline C. Kelly
Robert B. Sobelman
Mitzi S. Steiner
Assistant United States Attorneys
(212) 637-2456/2616/2284

cc: Kestine M. Thiele, Esq., and Anthony Cecutti, Esq. (by ECF)